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Park West Two
Cliff Mine Road
Pittsburgh, PA 15275
412-788-1080

C-34-11-3-314

To: FILE DATE: NOVEMBER 18, 1983

From: JOHN GEORGE JAG COPIES: R. DEJU
D. BRENNEMAN
SUBJECT: Asbestos Dump Site, Millington, NJ B. TURKA
Preliminary Site Investigation J. FERGUSON
November 2, 1983 R. MC KNIGHT
Project No. 0772.01 EPA Region II
G. KLEIN
NJDEP

TIFA, LTD. OFFICE, MILLINGTON, NJ

A meeting was held in the TIFA Ltd. offices prior to the field visit to the asbestos hill behind the plant. Those present were as follows:

Robert McKnight, EPA Region II Regional Site Project Officer (RSPO)
George Klein, NJDEP Bureau of Site Management, Site Manager
Arnold Livingston, TIFA, Ltd.
James Ferguson, NUS
Robert Turka, NUS
John George, NUS

Mr Livingston took the opportunity to discuss a change in TIFA's position regarding the asbestos hill. National Gypsum will pay off the mortgage on the property on November 3, and while they have an indemnity agreement with TIFA for 10-15 years, TIFA is concerned about potential liability for the Site.

Mr Livingston provided May 11, 1983 photos taken after a storm event which showed flow in the Passaic River about 1-2' above the top of riprap placed along the riverbank at the toe of the pile. He also showed a number of other photos taken prior to the installation of the riprap by National Gypsum.

According to Mr. Livingston, river levels generally fluctuate 3-4' during a rainfall event, and may range as much as 13-14' above normal pool during heavy storms.

Stormwater from Division Avenue now flows onto the TIFA property (a point that TIFA is presently discussing with Passaic Township) and is conducted around the asbestos hill via a 48" reinforced concrete pipe (RCP). The flow outlets at the head of a marshy area along Haas Road.

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The National Gypsum Company will not permit TIFA to do any remedial work on the asbestos hill outcrops. Such work would nullify the indemnity agreement. TIFA is concerned with erosion of the toe of the pile during high flows in the Passaic.

When TIFA installed the storm drain, they encountered asbestos waste. The waste apparently underlies almost all of the area between the buildings and the Passaic River, as well as a number of the buildings in the TIFA complex.

TIFA has trucked in about 1000 loads of clean quarry fill, covering about 7 acres of the dump nearest their buildings.

When TIFA was working in Buildings 2 and 3, in the extreme southeastern portion of the office complex, they discovered process and sanitary lines clogged with asbestos. They subsequently constructed a retaining wall in this vicinity in an attempt to confine the waste.

TIFA has requested permission from National Gypsum to pave over the surface of the asbestos hill nearest their buildings, but has been denied this permission.

There is no evidence of seeps from the asbestos hill according to Mr. Livingston. The RCP flows only following rainfall.

Other tenants of the TIFA complex are as follows:

- 2 printing shops
- 1 extruder of silicon wafers
- 1 insurance company
- 1 geologist
- 1 auto parts dealer
- 1 cosmetics dealer
- 1 oil company (Passaic Township is forcing this tenant out)

According to Mr. Livingston, TIFA is responsible for disposal of all solid waste generated by their tenants. There is no waste disposal problem. Two underground tanks were cleaned out when TIFA took over the property from National Gypsum. The tanks were found to have contained No. 6 heating oil. Mr. Livingston is unaware of any other buried tanks on the property.

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SITE VISIT - MILLINGTON ASBESTOS DUMP (ASBESTOS HILL)

This site occupies approximately 11 acres between the TIFA office buildings and the Passaic River. The most recent activity consisted of National Gypsum's resoiling and reseeding some eroded areas during the past summer.

The outcrops of the asbestos hill are approximately 60 degrees, and the pile shows evidence of tension cracking on the north and south-facing outcrops. This cracking was evident in the surface cover, and may not extend down into the pile itself. The surface of the pile facing the Passaic River supports a heavy growth of vetch, honeysuckle, and a few small trees, such as silver maples, poplar, and cedars.

A seep was noted at the junction of the marshy area to the southeast of the asbestos hill, and the Passaic River. The substrate in the vicinity of this seep was stained a dull orange. Iron may be common in the groundwater of this region, however. Flow was 1-2 gpm.

The Passaic River in the site vicinity appears to support a healthy benthic population, as evidenced by a number of mayfly and stonefly nymphs noted on the lower surfaces of the rocks. The streambed is also moss-covered.

PINE VALLEY TREE SERVICE

This site and the remaining two noted below are suspected areas where asbestos shingle may have been dumped during active manufacturing at the Millington plant. The site consists of a house presently undergoing renovation, an outbuilding, and a driveway paved with asbestos shingle. A larger dump area may be present at the end of the drive, but this is unknown at present. An area immediately behind the house may have been a dump for asbestos shingles, but is now being regraded and resoiled, apparently in preparation for establishment of a lawn around the house.

This site is privately owned, and the concern is for health impact to the occupants of the dwelling. No hazardous materials other than asbestos shingle are suspected of having been dumped here.

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WHITE BRIDGE ROAD SITE

This site consists of a mounded area in the center of a small horse track and training area, and the track itself, which may be paved with asbestos shingles.

This site is also privately owned. No hazardous materials other than asbestos shingles are suspected of having been dumped here.

GREAT SWAMP SITE

This site consists of a hiking trail and an area of about 11.5 acres (500' x 1000') within the Great Swamp National Wildlife Refuge which has been backfilled to an undetermined depth with asbestos shingle. The presence of the remains of pallets and metal bands suggests that the shingles may have been dumped into the swamp in units.

The concern at this site is that the area is open to the general public and that they may be unknowingly exposed to a respiratory hazard from the decomposing shingles. A few drum

carcasses were noted in the swamp, raising the possibility that material other than the shingles may have been dumped at this site.

SUMMARY

A conceptual approach was discussed for remedial investigations at each of the sites

- Millington Site (Asbestos Hill)

The potential presence of contaminants (e.g. phenyl mercuric acetate) within the dump other than asbestos dictates that a monitoring well network be established to overview groundwater quality, and that sampling of the Passaic River be done to evaluate potential water quality impacts from the site.

The fact that asbestos waste may underly some of the buildings, or that piping within the buildings may be contaminated will not be addressed until such time as additional information is provided which defines a problem in that area.

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No instream water quality standards exist for this portion of the Passaic River with respect to priority pollutants. George Klein will provide these standards as soon as possible after coordinating with the necessary agencies in NJDEP.

- Pine Valley Tree Service and White Bridge Road Sites
The RI at these sites will consist of identifying the extent of asbestos shingle disposal and characterizing the health threat as a result of decomposition of the shingles.
- Great Swamp Site
Due to the surface area involved and the presence of drum carcasses in the swamp, the site will first be scanned to define any areas which may be suspected of harboring concentrated groundwater contamination. This may involve the use of geophysics, metal detection, or a system of shallow wells.

Bob McKnight could offer little comment on the work plan which NUS had reviewed with the work assignment, since he had not prepared the work plan. He suggested that I coordinate within EPA headquarters regarding any questions.

He will be out of the office through November 17. A final schedule for delivery of the draft work plan will be identified at that time.

After concluding discussions with Bob McKnight and George Klein we drove to Trenton where well logs were consulted at the Division of Water Resources, and geologic publications were obtained.